

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

2017 JUN -6 PM 4: 23

UNITED STATES OF AMERICA

v.

FELICIA LIVINGSTON, aka "Snoop,"
MICHAEL BROCKENBAUGH, aka "JD,"
and MAURICE NIX, aka "Moe,"
Defendants.

Case No. 5:15-cr-114

CLERK
BY  DEPUTY CLERK

FOURTH SUPERSEDING INDICTMENT

The Grand Jury charges as follows:

COUNT 1

Between in or about 2013 and in or about September 2015, in the District of Vermont and elsewhere, the defendants, FELICIA LIVINGSTON, aka "Snoop," MICHAEL BROCKENBAUGH, aka "JD," and MAURICE NIX, aka "Moe," knowingly and willfully conspired with each other, Michael Villanueva, aka "Unc," Dorsey Hunt, aka "Jah," and others known and unknown to the grand jury to distribute heroin, a Schedule I controlled substance, and cocaine base, a Schedule II controlled substance.

The conduct of defendant FELICIA LIVINGSTON, aka "Snoop," as a member of the conspiracy, including the reasonably foreseeable conduct of other members of the conspiracy, involved 100 grams or more of a mixture or substance containing a detectable amount of heroin and 28 grams or more of a mixture or substance

containing a detectable amount of cocaine base.

The conduct of defendant MICHAEL BROCKENBAUGH, aka "JD," as a member of the conspiracy, including the reasonably foreseeable conduct of other members of the conspiracy, involved a kilogram or more of a mixture or substance containing a detectable amount of heroin and 280 grams or more of a mixture or substance containing a detectable amount of cocaine base.

(21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(A), (B) & (C))

COUNT 2

On or about October 1, 2015, in the District of Vermont and elsewhere, defendant MICHAEL BROCKENBAUGH, aka "JD," knowingly and intentionally used a communication facility, a telephone, in facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1), that is, distribution of heroin, a schedule I controlled substance, and cocaine base, a schedule II controlled substance.

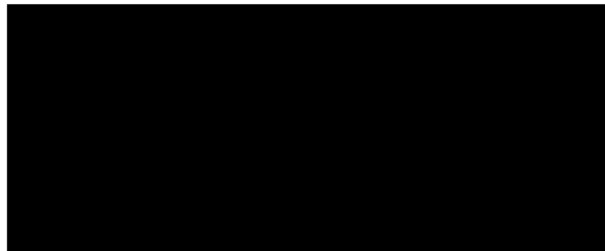
(21 U.S.C. §§ 843(b))

COUNT 3

On or about October 2, 2015, in the District of Vermont and elsewhere, defendant MICHAEL BROCKENBAUGH, aka "JD," knowingly and intentionally used a communication facility, that is, a telephone, in facilitating the commission of a felony under Title 21, United States Code, Section 841(a)(1), that is distribution of heroin, a schedule I controlled substance, and cocaine base, a schedule II controlled substance.

(21 U.S.C. §§ 843(b))

A TRUE BILL



Eugenia A.P. Cowles (by JRP)
EUGENIA A.P. COWLES
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Burlington, Vermont
June 6, 2017